

Exhibit “4”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/22/2024

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RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

-v-

RUDOLPH W. GIULIANI,

Defendant,

-and-

ANDREW H. GIULIANI,

Intervenor-Defendant
Applicant.
-----X

24-mc-00353 (LJL)

ORDER

LEWIS J. LIMAN, United States District Judge:

On October 22, 2024, the Court issued an Opinion and Order (the “Turnover Order”) appointing Ruby Freeman and Wandrea’ Moss (“Plaintiffs-Receivers”) of the specified Receivership Property of Defendant. Dkt. No. 62. The Turnover Order ordered Defendant to deliver to Plaintiffs-Receivers the Receivership Property enumerated in the Order by October 29, 2024. Dkt. No. 62 at 16 ¶ 2. Among other things, it also ordered Defendant, his agents, employees, and those acting in concert with them to comply with the directives of the Plaintiffs-Receivers issued pursuant to the Turnover Order. *Id.* at 21 ¶ 4(f). Defendant did not object to the appointment of receivers or to the terms of the Turnover Order or powers of the receivers, other than limited objections with respect to specific items of property. Dkt. No. 44. No motion for reconsideration of the Turnover Order was made.

On November 7, 2024, after the Court had been informed that Defendant had turned over none of the Receivership Property ordered to be turned over by October 29, 2024, the Court issued a further order¹ that was then memorialized in a November 8, 2024 written order. Dkt. No. 94. As memorialized in the November 8, 2024 order, Defendant was required by November 15, 2024, to deliver to Plaintiffs-Receivers “all items of property identified in the Turnover Order, according to the Plaintiffs-Receivers’ instructions.” *Id.* at 2. Defendant has not complied with that order nor with the Turnover Order. Dkt. No. 147.

In light of Defendant’s noncompliance, Plaintiffs-Receivers have issued new directives to Defendant pursuant to the Turnover Order. *Id.* at 7-8. The Court has reviewed the directives and finds that they are consistent with, and authorized by, the Turnover Order. Accordingly, and for the avoidance of doubt, the Court orders that Defendant Giuliani shall comply with the following instructions provided by the Plaintiffs- Receivers on pain of contempt:

1. By no later than 5 p.m. Friday, December 6, 2024, Mr. Giuliani shall segregate all Receivership Property located at the CTS Facility from property that is not subject to the Turnover Order;
2. By the same date and time, Mr. Giuliani shall provide a detailed list containing pictures of the segregated Receivership Property located at the CTS Facility sufficient to show the size and quantity of that property;
3. By Monday, December 9, 2024, the Receivers will provide Mr. Giuliani with the location of a New York-based storage facility, and the date and time when Mr. Giuliani shall deliver all of the Receivership Property located at the CTS Facility;
4. Mr. Giuliani shall deliver all of the Receivership Property stored at the CTS Facility to the New York-based storage facility provided by Receivers no later than Friday, December 13, 2024;
5. Defendant Giuliani, his attorneys, agents, and persons in active concert or participation with him or them shall not transfer, encumber, or interfere with any of Defendant’s

¹ Defendant was present in Court when the Court delivered the November 7, 2024 order.

property located at Corporate Transfer and Storage, Inc. (“CTS”) or America First Warehouse (“AFX”) until the Receiver files notice on the docket that the above conditions have been satisfied.

SO ORDERED.

Dated: November 22, 2024
New York, New York



LEWIS J. LIMAN
United States District Judge